

**REMARKS AND ARGUMENTS**

***Claim Rejections - 35 USC § 102***

The Examiner rejected claims 13, 15-19, 44 and 45 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,766,987 to Mitchell et al. (hereafter "Mitchell"). Of these, claim 13 is an independent claim from which the remaining claims depend.

Although Applicant respectfully disagrees with the examiner's rejections, claim 13 has been amended herein to further distinguish them from Mitchell and to more fully describe the present invention. The method of Claim 13 has been amended so that the curable coating material is now injected or otherwise introducing into said mold "under ambient pressure". Support for this amendment can be found in the drawings and specification as originally filed such as in Figures 1-4 and the accompanying description in the specification.

Mitchell does not disclose or teach this element. Mitchell teaches a much more complex process having a fixture that must undergo processing at an evacuation and pressurization station 92. This station comprises a conventional vacuum source 94 and a source of compressed gas. At this station air is withdrawn from the spaces 72 between the elastometric element 70 of the microelectronic subassemblies as well as from all to the surrounding gaps and openings. The fixture is then tilted to introduce an encapsulant into the mold. The fixture is then placed under a pressurized gas source to increase the pressure within the interior space of the fixture to about 10 atmospheres. (Mitchell: col. 8, line 25 to col. 9, line 18).

Claim 13, by contrast does not require this complex evacuation and pressurization process and the associated features that allows for this, such as sealing and valve

features. None of the references alone or in combination teach or suggest the elements of claim 13, and claim 13 is allowable over the cited references. Claim 15-19 and 42-44 depend from allowable claim 13 and are also allowable.

Claim 46

Method claim 46 has been added having similar limitations to claim 13, but including the further element of not requiring "a bias between said between either of said upper and lower sections and the features of said semiconductor devices". Mitchell by contrast requires the inclusion of complex elastomeric elements 70 between the dielectric layer and the microelectronic elements to the terminals to form a bias that holds the dielectric layer in engagement with the top fixture element 32 (Mitchell: col. 8, lines 11-16). Mitchell also discloses the inclusion of gas pressure to form a further bias that holds dielectric layers to the top fixture element (Mitchell: col. 9, lines 18-23).

None of the references, alone or in combination, teach or suggest the elements of claim 46, and claim 45 is allowable over the cited references.

***Claim Rejections - 35 USC § 103***


The Examiner rejected claims 42 and 43 under 35 U.S.C. 103(a) as being unpatentable over Mitchell in view of U.S. Patent No. 6,252,254 Soules et al. These claims depend from allowable claim 13 and are also allowable.

CONCLUSION

Applicant submits that claims 13, 15-19, and 42-46 are in condition for allowance and requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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